



Environmental & Geotechnical Solutions

September 15, 2011

Mr. Dave Bartus
USEPA Region 10
1200 6th Ave
Seattle, WA 98101

RE: Cleanup Plan

MOA Parcel 3, Tract B, Municipal Industrial Subdivision
ADEC File No. 2100.38.504

Dear Mr. Bartus:

As we discussed during our telephone conversation earlier today, the proposed work documented in "*Self Implementing Cleanup Plan Reeve Blvd. Site*" as approved by the Alaska Department of Environmental Conservation appears defensible. However, some aspects of the work plan are not consistent with the proscriptive requirements for self-implementing cleanups under 40 Code of Federal Regulations (C.F.R.) 761.61(a). For example, 40 C.F.R. 761.61(a)(6) requires that "Any person collecting and analyzing samples to verify the cleanup and on-site disposal of bulk PCB remediation wastes [...] must do so in accordance with subpart O of this part." In turn, Subpart O requires use of a 1.5 meter (4.9 foot) sample grid. The existing site characterization sampling, and proposed post-excavation verification sampling, however, are based on a 20'x20' grid, somewhat exceeding the proscriptive requirements of 40 C.F.R. 761.61(a)(6). Therefore, the cleanup would not be conducted in compliance with the requirements of 40 C.F.R. 761.61(a), even though the proposed cleanup appears to be fully defensible on a site-specific basis.

As a result, I would like to propose that this cleanup be conducted under the risk-based disposal authority of 40 C.F.R. 761.61(c), which provides the EPA with authority to approve sampling, cleanup or disposal of PCB remediation waste in a manner other than prescribed in 40 C.F.R. 761.61(a) or (b).

Per your request, I have requested that a representative of the Municipality of Anchorage forward this letter to you directly together with an email stating their concurrence with this approach.

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If you have any questions, please feel free to contact me at your earliest convenience.

Sincerely,

ALTA Geosciences, Inc.



Alex Tula, L.G.

Principal Consultant

Cc: Mr. Todd Blessing; ADEC
Mr. Dan Duncan; USEPA Region 10
Ms. Alison Smith; Heritage Land Bank
Susan Reeves, Esq.; Amodio & Reeves